

despite the passage of the deadline. Additionally, the City would point out that all of the substantive deadlines in the scheduling order have passed with the exception of the pretrial deadlines.³ Thus, this case has been through a full discovery period.

Accordingly, the City respectfully requests that this case be dismissed with prejudice as to the City. (The City takes no position regarding the disposition of this matter as it relates to any other party.) The City further requests any additional relief to which it is justly entitled.

Respectfully submitted,

/s/ Darrell Noga

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³ ECF Doc 15-Scheduling Order.

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on August 12, 2016, a true and correct copy of the foregoing was filed with the Clerk of the Court via the CM/ECF system and served on all parties in accordance with the Federal Rules of Civil Procedure, as follows:

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